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April 10, 2015

Document Control Office (7407)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
Attn: TSCA Section 8(e) Coordinator
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20004

Re:

TSCA Section 8(e) Notification of Substantial Risk:

1,2-Ethanediamine, N-[3-(trimethoxysilyl)-propyl]-, N-[(ethenylphenyl)methyl] derivs.,

hydrochlorides and N-(3-Trimethoxysilyl)propyl)ethylenediamine in methanol

Dear TSCA Section 8(e) Coordinator:

In accordance with the provisions of Section 8(e) of the Toxic Substances Control Act (TSCA), as interpreted in the TSCA Section 8(e) Policy Statement and Guidance, Fed. Reg. 33129 (June 3, 2003) and other Agency guidance, Dow Corning Corporation submits information concerning a skin sensitization study with a mixture of 1,2-Ethanediamine, N-[3-(trimethoxysilyl)-propyl]-, N-[(ethenylphenyl)methyl] derivs., hydrochlorides and N-(3-Trimethoxysilyl)propyl)ethylenediamine in methanol. Submission of this information is driven by review of study reports for materials that share structural similarity with a REACH registration material.

Chemical Substances

Chemical Abstract Number	Weight Percent	Component Name
67-56-1	50-70	Methanol
171869-89-9	30 - 50	1,2-Ethanediamine, N-[3-(trimethoxysilyl)-propyl]-, N-[(ethenylphenyl)methyl] derivs., hydrochlorides
1760-24-3	10 - 20	N-(3-(Trimethoxysilyl)propyl)ethylenediamine

Study Type

Skin sensitization using the Guinea-pig (Buehler method -3 induction applications)

Summary

The study was designed to assess the skin sensitization potential of the test material using the guinea pig.

The procedure used is described in this report. The procedure complies with that described in the OCED Guideline for Testing of Chemicals No.406 "Skin sensitization" Adopted 17 July 1992. The method used was a modification of that described by BUEHLER, E.V. (1965), Delayed contact hypersensitivity in the guinea-pig. Arch. Dermatol., 91, 171-177.

Based on the results of a preliminary study and in compliance with the guideline, the following dose levels were selected:

Induction applications (3): Test Material, as supplied Challenge application: Test Material, as supplied

Twenty test and ten control guinea pigs were used in the main study and five vehicle control and five positive control animals were used in the positive control study.

In this study the test material produced clear evidence of skin sensitization (delayed contact hypersensitivity) in six of the twenty test animals. Eight animals gave inconclusive responses and the remaining six animals gave negative responses. As more than 15% of the animals gave positive responses, the test material was considered to have the potential to cause skin sensitization.

All animals in the positive control group produced evidence of skin sensitization following treatment with hexyl cinnamic aldehyde.

Dow Corning has not made a determination as to whether a significant risk or injury to human health or the environment is actually presented by the findings. Dow Corning Corporation will notify EPA of any further relevant information that may develop concerning this product. If you have any questions concerning this submission, please contact me at (989) 496-1838, l.d.kennan@dowcorning.com, or at the address provided herein.

Sincerely,

Vice President, Corporate Stewardship

Dow Corning Corporation

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